

January 4, 2012

Dr. Al Armendariz, Regional Administrator United States EPA Region VI 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Re: State of Arkansas's designation of the former Cedar Chemical site as its

highest priority under 40 CFR 300.425(c)(2)

Dear Dr. Armendariz:

The State of Arkansas designates the former Cedar Chemical Corporation facility as its highest priority for remediation to mitigate contamination on- and off-site to protect human health and the environment. As the highest priority of the State of Arkansas, pursuant to 40 C.F.R. § 300.425(c)(2), the State of Arkansas requests that the former Cedar Chemical Corporation facility be added to the National Priority List.

The former Cedar Chemical Corporation facility is an abandoned chemical manufacturing facility, located at 49 Phillips Road 311 in Helena-West Helena, Phillips County, Arkansas. The site consists of approximately 48 acres located on Highway 242, one mile southwest of the intersection of U.S. Highway 49 and Highway 242. The facility is made up of six production units and support facilities, an office building, and a biological treatment system. Active processes were conducted on approximately 20 acres of the site. The remainder of the site contains biological treatment ponds and closed surface impoundments.

The owners and operators of the Cedar Chemical Corporation facility cleaned some production units prior to abandoning the site. The EPA Region 6 Emergency Response staff conducted a removal action involving some tanks and piping associated with the production area of the site. The EPA's emergency response listed 33 hazardous substances, including flammables, reactives, and corrosives. The completeness of tank cleanings and residual elements is unknown. Surface soils, subsurface soils, surface water bodies, and groundwater all tested positive for one or all of the following: pesticides, volatile organics, and heavy metals. Eighty solid-waste-management units have been identified on-site, to date, and are deemed areas of concern.

Three Potential Responsible Parties funded investigative work and have secured the site. Those parties have chosen not to submit any additional monies to conduct further investigative work or implement remedial actions. The available state funds are not sufficient to conduct the necessary investigative work and remedial actions to clean the former Cedar Chemical Corporation facility.

The State of Arkansas respectfully requests that the former Cedar Chemical Corporation facility be placed on the National Priority List as the State of Arkansas's highest priority for the reasons stated herein. The Arkansas Department of Environmental Quality is available to answer your questions or provide any additional information you may require. Please feel free to contact Benjamin T. Jones, attorney, at (501) 682-0889. Thank you for your prompt attention to this matter.

Sincerely

Mike Beebe

MB:jb